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**California Department of Public Health**



EDMUND G. BROWN, JR.  
Governor

July 17, 2015

AFL 15-03.1  
(Supersedes AFL 08-09 and AFL 10-01)

**TO:** Acute Psychiatric Hospitals  
General Acute Care Hospitals  
Special Hospitals

**SUBJECT:** Reporting of Healthcare Acquired Pressure Ulcers

**AUTHORITY:** Health and Safety Code (HSC) section 1279.1(b)(4)(F); Title 22 of the California Code of Regulations (CCR) sections 70717, 70749, 71517 and 71549

**All Facilities Letter (AFL) Summary**

- Hospitals are required to report, as adverse events, Stage 3 or Stage 4 pressure ulcers acquired after admission to the hospital, excluding progression from Stage 2 to Stage 3 if Stage 2 was recognized upon admission.
- This AFL supersedes AFL 08-09 and AFL 10-01, and replaces AFL 15-03, which provided guidance to hospitals for classification and reporting of unstageable pressure ulcers. This AFL clarifies that an unstageable pressure ulcer is not reportable to CDPH unless it is acquired after admission to the hospital. Clarification of HSC section 1279.1(b)(4)(F) will be provided in regulations that are currently under development.

Pursuant to HSC section 1279.1(a), general acute care hospitals, acute psychiatric hospitals, and special hospitals must report an adverse event to the California Department of Public Health (CDPH) no later than five days after the adverse event has been detected, or, if that event is an ongoing urgent or emergent threat to the welfare, health, or safety of patients, personnel, or visitors, not later than 24 hours after the adverse event has been detected. Further, HSC section 1279.1(c) requires the facility to inform the patient or the party responsible for the patient of the adverse event by the time the report is made.

The term “adverse event” includes any one of 28 specified events. HSC section 1279.1(b)(4)(F) states that an “adverse event” includes a Stage 3 or 4 ulcer, acquired

after admission to a health facility, excluding progression from Stage 2 to Stage 3 if Stage 2 was recognized upon admission.

Hospitals are required to perform a patient assessment and document the patient's condition upon admission in the patient's medical record. (Title 22 CCR sections 70717, 70749, 71517, and 71549.)

Unstageable pressure ulcers are full thickness tissue loss where the actual depth of the ulcer is completely obscured by slough and/or eschar in the wound. Although the true depth of an unstageable pressure ulcer cannot be determined, it is a Stage 3 or 4 pressure ulcer. Therefore, an unstageable pressure ulcer present on admission to a hospital and subsequently staged as a 3 or 4 is **not** required to be reported by the hospital.

For additional information regarding prevention and treatment as well as the full list of pressure ulcer stages/categories, refer to the National Pressure Ulcer Advisory Panel webpage at:

<http://www.npuap.org/resources/educational-and-clinical-resources/npuap-pressure-ulcer-stagescategories/>

If you have any questions concerning this letter, please contact your respective District Office.

Sincerely,

**Original signed by Jean Iacino**

Jean Iacino  
Deputy Director